

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Case No. 1:20-MJ-307

JONATHAN EDWARD DREW,  
a/k/a “Jon Drew,”

AND

BRANDON HESTAND DOW,

Defendants.

**AFFIDAVIT IN SUPPORT OF A**  
**CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Joseph E. Nestro, being duly sworn, state the following:

1. I am a United States Postal Inspector and have been employed with the United States Postal Inspection Service since August of 2002. I am assigned to the Northern Virginia Mail Theft Team of the Washington Division. My responsibilities include the investigation of crimes against the U.S. Postal Service and crimes furthered through the use of the U.S. Mail. I have received extensive training in criminal investigative procedures, and have conducted criminal investigations involving mail theft, identity theft, and bank fraud.

2. This affidavit is submitted in support of criminal complaints and arrest warrants for **JONATHAN EDWARD DREW** and **BRANDON HESTAND DOW**, who, from on or about December 2019 to on or about August 2020, in the Eastern District of Virginia, did knowingly

conspire to execute a scheme and artifice to defraud a financial institution,<sup>1</sup> and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations, or promises, contrary to Title 18, United States Code, Section 1344, and in violation of Title 18, United States Code, Section 1349, and each knowingly transferred, possessed, or used, without lawful authority, a means of identification of another person in violation of Title 18, United States Code, Section 1028A.

3. The facts set forth in this affidavit are based on my personal knowledge and review of records, documents, and other physical evidence obtained during this investigation, as well as information conveyed to me by other law enforcement officials and private persons. All observations referenced in this affidavit that were not made by me were related to me by the person who made such observations. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only and are not intended to be a verbatim recitation of such statements.

4. Since this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrants, it does not include each and every fact observed by me or known to the United States. I have set forth only those facts necessary to support a finding of probable cause.

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<sup>1</sup> JPMorgan Chase Bank, N.A. (Chase), Wells Fargo & Company (Wells Fargo), and PNC Bank (PNC) provide a range of traditional banking services throughout the United States, including in the Eastern District of Virginia, and are financial institutions within the meaning of Title 18, United States Code, Section 20, and within the scope of Title 18, United States Code, Section 1344.

## **SUMMARY OF FACTS**

### **DREW and Victims B.A. and L.V.**

5. On or about January 23, 2020, B.A. made a report with the U.S. Postal Inspection Service that mail addressed to him and his wife, L.V., was stolen from his rural-style mailbox in a townhouse community named Walden Cluster in Reston, Virginia. B.A. stated that his wife's paycheck was stolen and he had a Chase credit card stolen on a different occasion in January 2020.

6. B.A. also stated that his wife's paycheck in the amount of \$1,262.19 was deposited into a Citibank checking account, which was fraudulently opened in L.V.'s name. L.V. had not opened the account, nor authorized anyone else to do so. I contacted a fraud investigator with Citibank and learned that account was opened online on January 6, 2020, using L.V.'s Personal Identifiable Information (PII). L.V.'s paycheck was mobile-deposited into this Citibank account on January 6, 2020.

7. On or about January 14, 2020, someone attempted to use B.A.'s Chase credit card to make a \$3,066.00 rent payment at the Vy Reston Heights Apartments in Reston, Virginia. Later in the investigation, I obtained information from the leasing office which revealed that the attempted payment was made for **DREW**'s apartment. Someone also used or attempted to use B.A.'s Chase credit card to make other purchases totaling \$689.20.

### **DREW and Victim A.W.**

8. On or about February 12, 2020, A.W., another resident in the Walden Cluster community, reported to the Fairfax County Police Department (FCPD) that two Discover credit cards were stolen from his mailbox. The cards were used to make several transactions in Reston and Herndon, Virginia.

9. On or about February 21, 2020, someone attempted to use one of A.W.'s Discover credit cards to make a purchase at the Target store in Reston, Virginia. Two of the items that this individual attempted to purchase were patio-style chairs. After attempting the transaction twice, the individual used other unknown credit cards to complete the purchase. I obtained video surveillance of the individual attempting to use A.W.'s credit card and leaving the store with the chairs. I later obtained photographs of **DREW** from the Virginia Department of Motor Vehicles (DMV). The individual who used A.W.'s credit card appeared to be **DREW**. A.W.'s Discover credit card ending in 2550 was used or attempted to be used to make purchases totaling \$2,180.42 and the Discover credit card ending in 5989 was used or attempted to be used to make purchases totaling \$3,182.86.

#### **DREW and the Red Jeep**

10. I also learned from FCPD that other residents from the Walden Cluster community reported that their mail had been stolen. One resident placed a surveillance camera on the eaves of his residence pointing toward the bank of nine mailboxes, which included B.A. and A.W.'s mailboxes. On several occasions, the camera caught the image of a red Jeep pulling up to the mailboxes and the driver reaching into them.

11. On or about the morning of February 23, 2020, a resident of the Walden Cluster community was walking her dog when she encountered the red Jeep at the mailboxes. She took a photograph of the license plate of that vehicle and its driver. The driver drove away quickly. The photograph of the Virginia license plate was visible, but the photo of the driver was not. The resident described the driver as a white male of average build.

12. I learned that this vehicle was rented from Enterprise Rent-A-Car (RAC) and contacted them. They relayed that **DREW** was renting the vehicle on February 23, 2020. A record check for **DREW** in Virginia identified a person by that name who lived at the Vy Reston Heights Apartments complex. As described in paragraph 7, this is the location at which someone attempted to use B.A.'s Chase credit card to make a \$3,066 rent payment for **DREW**'s apartment.

**DREW is Identified as the Person Who Used B.A.'s Credit Card to Make a Rent Payment**

13. On February 24, 2020, I learned from the leasing agents at the Vy Reston Heights Apartments that **DREW** had made several rent payments to the complex, including the \$3,066 attempted payment on January 14, 2020, using B.A.'s Chase credit card. **DREW** had made approximately \$12,000 in declined or reversed payments while he resided there. One of the documents provided by the complex was a copy of **DREW**'s Virginia driver's license which matched the one previously obtained from the Virginia DMV.

**DREW, Victim J.W., and DREW's Second Residence**

14. Thereafter, I learned of a piece of mail addressed to J.W. that was set to be delivered to **DREW**'s residence at the Vy Reston Heights Apartments. A records check revealed an individual with J.W.'s name at an address in Herndon, Virginia. A phone number associated with J.W. returned to the EXO Reston Apartments complex in Reston, Virginia. I learned that **DREW** had submitted a Change of Address for himself from an apartment at the Vy Reston Heights Apartments to an apartment at the EXO Reston Apartments complex. I conducted surveillance at the identified apartment at the EXO Reston Apartments complex. On the balcony of the apartment, I observed and took photographs of two patio-style chairs. I then went to Target and compared the photographs of the chairs on the balcony of the apartment with the actual Stock-Keeping Unit

(SKU) numbers of the ones that an individual had attempted to purchase at the Target store using B.A.'s credit card (and then purchased using an unknown credit card). The chairs appeared to be the same style and color.

15. On March 25, 2020, I obtained documents from the manager at the EXO Reston Apartments which revealed that **DREW** was living in the apartment referenced in his change of address form—the same one at which I observed the chairs. However, the residence had been rented in J.W.'s name, using his PII.

**Execution of a Virginia Search Warrant and Arrest Warrant  
at DREW's EXO Reston Apartment, and DREW's Confession**

16. On March 26, 2020, the U.S. Postal Inspection Service and FCPD served a Virginia state search warrant at **DREW's** EXO Reston apartment and arrested him on a state warrant. Investigators advised **DREW** of his *Miranda* warnings, which he waived in writing. During an interview, he admitted to stealing mail at the Walden Cluster mailboxes, including B.A.'s Chase credit card, L.V.'s paycheck, and A.W.'s two Discover credit cards. He also admitted to using L.V.'s PII to open the Citibank checking account online, into which he deposited L.V.'s paycheck. **DREW** identified himself in the Target surveillance photographs and the resident's home security camera depicting him stealing from mailboxes at the Walden Cluster community. He further admitted to stealing mail from the mailbox at J.W.'s residence in Herndon, Virginia, and leasing the EXO Reston apartment in J.W.'s name, with J.W.'s PII, as well as obtaining a cell phone account in J.W.'s name. I spoke with J.W. and he stated that he did not enter into a lease at the EXO Reston Apartments, nor did he authorize anyone else to do so on his behalf.

17. **DREW** was transported to the Fairfax County Adult Detention Center where he was presented to a Magistrate for Fairfax County. **DREW** was released from custody on \$1,000 bond pending his preliminary hearing.

18. Pursuant to the search warrant, investigators seized stolen U.S. Mail and fraudulently applied for credit and debit cards from **DREW**'s residence. Investigators also recovered laminated sheets of paper which contained at least 40 individuals' names, PII, bank account information, email addresses, and phone numbers. Included in this list was B.A., L.M., A.W., and J.W. **DREW** stated there were other people he associated with that knew more about committing financial fraud than him. One person he mentioned was **DOW**.

**DREW Continues His Crimes After His Release from State Custody/  
DREW and Victim J.J.**

19. On or about May 13, 2020, J.J., who resides in Reston, Virginia, placed 41 checks totaling approximately \$714,000.00 in her rural-style mailbox for pickup by the U.S. Postal Service. She had been working from home due to the COVID-19 pandemic and was conducting business for her employers: National Telecom Cooperative Association (NTCA), Services Management Corporation (SMC), and the Foundation for Rural Service, a non-profit, located in Arlington, Virginia. Of the 41 checks that J.J. mailed, 25 were business checks payable to vendors doing business with her employers and were drawn on NTCA and SMC's bank accounts. One of the checks was #046845, dated May 14, 2020, in the amount of \$25,000, drawn on SMC's Bank of America account and made payable to Morneau Shepell Ltd. A chart listing all the SMC and NTCA checks are in the table below. All of the checks in the chart were found in an August 3, 2020 search of **DREW**'s residence, *see* para 43, except for the Morneau Shepell Ltd. check, which

was later determined to be counterfeited and deposited into another fraudulently opened bank account.

### SMC and NTCA Checks Stolen from J.J.'s Mailbox

Vendor	Vendor Name	Check Date	Check Number	Check Amount	Payment Entry Type
000275	United Parcel Service	5/14/2020	046835	\$45.89	Check
002850	TELCOM INSURANCE GROUP	5/14/2020	046836	\$46.00	Check
003122	Dell Marketing L.P.	5/14/2020	046837	\$17,106.42	Check
003151	U.S. Postal Service	5/14/2020	046838	\$3,500.00	Check
003857	Express Services, Inc.	5/14/2020	046839	\$1,345.20	Check
004015	Citrix System, Inc.	5/14/2020	046840	\$3,327.75	Check
004185	Iron Mountain Records Mgmt.	5/14/2020	046841	\$844.89	Check
103279	Efax Corporate	5/14/2020	046842	\$557.14	Check
210485	Young Office Environments, Inc.	5/14/2020	046843	\$69.55	Check
211001	New Target Inc.	5/14/2020	046844	\$4,500.00	Check
211038	Morneau Shepell Ltd	5/14/2020	046845	\$25,000.00	Check
211941	NiTel, Inc.	5/14/2020	046846	\$1,407.99	Check
212119	Bognet Construction Associates, Inc.	5/14/2020	046847	\$447,259.54	Check
212130	Masergy Communications, Inc.	5/14/2020	046848	\$5,623.00	Check
212225	Diligent Corporation	5/14/2020	046849	\$3,588.00	Check
			<b>Total SMC</b>	<b>\$514,221.37</b>	
Vendor	Vendor Name	Check Date	Check Number	Check Amount	Payment Entry Type
001104	Canby Telephone Association	5/14/2020	052388	\$5,000.00	Check
004581	Wolters Kluwer Legal & Regulatory US	5/14/2020	052389	\$12,906.00	Check
006784	Nasba	5/14/2020	052390	\$795.00	Check
103542	Plus One Strategic Communications	5/14/2020	052391	\$4,650.00	Check
210128	Association Consulting Group, Inc.	5/14/2020	052392	\$10,472.00	Check



210244	Nationwide Pet Insurance	5/14/2020	052393	\$243.61	Check
210492	Farmers Mutual Telephone Co.	5/14/2020	052394	\$149.00	Check
210676	Law Offices of Gregory J. Vogt, PLLC	5/14/2020	052395	\$212.50	Check
211919	Conrad, Inc.	5/14/2020	052396	\$12,500.00	Check
212226	Intrado Digital Media, LLC	5/14/2020	052397	\$57,250.00	Check
			<b>Total NCTA</b>	<b>\$104,178.11</b>	

### **DOW and Victim T.M.**

20. On or about May 28, 2020, **DOW** rented a black Camaro from Hertz Corporation at Reagan/National Airport in Arlington, Virginia, using his Virginia driver's license. I obtained a surveillance photograph of the individual in the vehicle as it was leaving the rental lot and the person appears to be **DOW**. I was able to review booking photos from a recent arrest of **DOW** and a Virginia DMV photograph of **DOW**. In the surveillance photograph, the individual has short brown hair, a slight beard and mustache, and is wearing a chain around his neck affixed with a crucifix that comes down to the middle of his chest. The individual also appears to have a diamond-like stud earring in his left ear.

21. On or about May 29, 2020, T.M., who lives in Ashburn, Virginia, invited a male acquaintance to his residence whom he met online. The acquaintance used the moniker "therealbdow" on SnapChat, an online photo sharing/messaging app. On May 30, 2020, T.M. realized that his wallet was missing. Some of the items in the wallet were his Virginia driver's license, a Wells Fargo Visa credit card, a Stash VISA credit card, and other credit cards. T.M. checked his credit card usage and found that his Wells Fargo Visa card had been used to make an attempted \$211.99 purchase at the Target store located at 500 S. Washington Street in Falls Church, Virginia. A few minutes later, in the same store, T.M.'s Stash VISA credit card was used

to make a \$50.22 purchase. Among the items purchased in this transaction was a Speck Folio iPad cover. T.M. contacted the Loudoun County Sheriff's Office (LCSO) and filed a larceny report. A detective from the LCSO began an investigation.

22. On or about June 12, 2020, someone opened an online PNC Bank account using T.M.'s PII and his Virginia driver's license. The individual who opened the account identified Data Particles, LLC as T.M.'s employer. T.M. is not employed by this company. The individual who opened the PNC Bank account provided his email address as hobbinrood@protonmail.com. T.M. did not open or authorize anyone to open this bank account using his identity.

23. On or about June 18, 2020, an individual entered a Wells Fargo Branch located at 300 I Street, NW in Washington, D.C., and deposited a check payable to T.M., in the amount of \$2,500 drawn on SMC's Bank of America account into T.M.'s real Wells Fargo bank account. The individual then withdrew \$1,000.00. The check was later determined to be a counterfeit made by using the SMC checks stolen from J.J.'s mailbox as a guide. The individual presented as identification a Virginia driver's license with the same number and expiration date as T.M.'s Virginia driver's license. A surveillance photograph obtained from a Wells Fargo Bank investigator depicted the individual who made these transactions as a male, appearing to have a slight beard and wearing a chain around his neck affixed with a crucifix that came down to the middle of his chest. Although the individual depicted in the surveillance images in this and in subsequent fraudulent transactions was wearing a surgical style mask, the individual in the surveillance photographs resembles **DOW**.

24. On or about June 19, 2020, an individual entered a Wells Fargo Branch located at 701 E. Market Street in Leesburg, Virginia, and withdrew \$1,000.00 from T.M.'s account. The

individual again presented as identification a Virginia driver's license with the same number and expiration date as T.M.'s Virginia driver's license.

25. On or about June 25, 2020, **DOW** rented a white Range Rover from Hertz Corporation at Dulles International Airport in Dulles, Virginia. **DOW** used his Virginia driver's license during the rental process. I obtained surveillance photographs and video of the individual at the rental counter and of the driver of the vehicle as it was leaving the rental lot. The person depicted appears to be **DOW**. The individual in the surveillance images has short brown hair, a slight beard and mustache, and was wearing a red baseball cap with a black Nike "swoosh" logo on the front and a black T-shirt.

26. On or about June 26, 2020, an individual entered a PNC Bank located in a Giant Food store at 44110 Ashburn Shopping Plaza in Ashburn, Virginia, and presented a check payable to T.M., in the amount of \$3,000.00, drawn on Dayton Contemporary Dance Co.'s PNC Bank account. The check was deposited into the fraudulently-opened PNC Bank in T.M.'s name. The individual then withdrew \$1,000.00. The individual presented as identification a Virginia driver's license with the same number and expiration date as T.M.'s Virginia driver's license. A surveillance photograph obtained from a PNC Bank investigator depicted this individual as a male, appearing to have short brown hair and a slight beard, and wearing a red baseball cap with a black Nike "swoosh" logo on the front and a black T-shirt under a long-sleeve shirt. The individual also appears to have a diamond-like stud earring in his left ear. The individual in the surveillance photographs resembles **DOW**.

27. On or about June 29, 2020, an individual drove a white Range Rover, similar to the one **DOW** rented on June 25, 2020, through the drive-thru at the PNC Bank located at 44080

Pipeline Plaza in Ashburn, Virginia. The individual presented a check payable to T.M., in the amount of \$2,000, drawn on L.N.W.'s BB&T Bank account. The check was deposited into the fraudulently opened PNC Bank account in T.M.'s name. The individual then withdrew \$2,500.00. The individual presented as identification a Virginia driver's license with the same number and expiration date as T.M.'s Virginia driver's license. Surveillance photographs obtained from a PNC Bank investigator depicted this individual as a male, appearing to have short brown hair, a slight beard, and wearing a red baseball cap with a black Nike "swoosh" logo on the front. The individual also appears to have a diamond-like stud earring in his left ear. The individual in the surveillance photographs resembles **DOW**.

28. Both checks deposited into the fraudulently-opened PNC Bank account in T.M.'s name were returned by their respective banks.

#### **Execution of a Virginia Search Warrant at DOW's Residence**

29. On or about September 1, 2020, LCSO executed a Virginia state search warrant on **DOW**'s residence that he shared with his parents on Sycolin Road in Leesburg, Virginia, within the Eastern District of Virginia. Investigators seized **DOW**'s iPhone and a Speck Folio iPad cover like the one purchased using T.M.'s stolen Stash credit card. During service of the search warrant, investigators took photographs of items found in **DOW**'s room, including a medium length necklace with a crucifix which appeared to be identical to the one worn by **DOW** when he rented the Camaro on May 28, 2020, and during one of the fraud transactions on June 18, 2020.

30. Investigators extracted data from the seized iPhone. On the phone was a photograph of a screen from some type of monitor with a confirmation from PNC Bank acknowledging the opening of the account using T.M.'s identity. Also on the phone was an email exchange between

**DOW**, using the email address brandon.dow.95@gmail.com and Microsoft confirming that he changed his primary email alias from brandon.dow.95@gmail.com to hobbinrood@protonmail.com. (This was the email provided to open the fraudulent PNC account on June 12, 2020 in T.M.’s name.)

### **DOW’s Confession**

31. On or about September 29, 2020, a LCSO detective and I interviewed **DOW** at the Loudoun County Adult Detention Center. **DOW** was read his *Miranda* warnings and acknowledged that he understood them. He then agreed to answer questions posed to him without an attorney present. **DOW** was shown a photograph of **DREW** and admitted that he has known **DREW** for approximately three years. **DOW** also admitted to knowing T.M. **DOW** was shown photographs of checks from his iPhone belonging to Dayton Contemporary Dance Co. and SMC, similar to the ones he deposited. He stated that **DREW** had shown him pictures of the checks and they “belonged” to **DREW**. **DOW** said that **DREW** had used him to cash and deposit checks as a “test run,” and if successful, **DREW** could try to cash and deposit checks for larger denominations.

### **DREW and Victims K.S., E.R., and Data Particles, LLC**

32. On or May 31, 2020, K.S., who resides in Reston, Virginia, placed a letter in his mailbox addressed to the Internal Revenue Service (IRS) containing a check payable to the U.S. Treasury for \$15,000 and drawn on his First Internet Bank of Indiana (FIBI) checking account. The check also bore K.S.’s social security number.

33. On or about June 25, 2020, K.S. was notified by FIBI that someone had tried to deposit a check in the amount of \$2,500 made payable to K.S. and drawn on his checking account into a Meed bank account bearing K.S.’s name. Meed is a subsidiary of Vast Bank. K.S. did not

open an account at Meed bank nor did he write this check. K.S. suspected that his IRS check had been stolen as it was never cashed by the U.S. Treasury.

34. On or about July 21, 2020, FIBI notified K.S. that a wire transfer was attempted in the amount of \$17,000 from another FIBI account, opened in the business name of Data Particles, LLC to a Bancorp Bank account bearing his name. The primary owner listed on the Data Particles, LLC account was J.B. at **DREW's** Vy Reston Heights Apartments address. K.S. did not have a bank account at Bancorp Bank nor did he have any knowledge of Data Particles, LLC, or J.B. K.S. made a police report with the FCPD.

35. Investigators from FCPD contacted A.R. who owns Data Particles, LLC in Reston, Virginia. A.R. told investigators that he moved from Reston, Virginia, to Herndon, Virginia, but still owns the residence and still receives mail there for his business. A.R. did not know J.B., the Vy Reston Heights Apartments address, or the FIBI account for Data Particles, LLC.

36. I contacted A.R. who advised that he was missing two checks made payable to his business, Data Particles, LLC, from Grant Thornton Public Sector. The checks were in the amounts of \$20,317.50 and \$45,200.00. He stated the checks were for a contract his company was working on and should have been mailed to his Reston, Virginia address in April or May 2020.

37. On or about July 23, 2020, the assistant manager at the Vy Reston Heights Apartments contacted me regarding **DREW's** attempt to pay his rent with a check drawn on an FIBI account in the name of Data Particles, LLC, in the amount of \$26,172.30. The check bore **DREW's** Vy Reston Heights Apartments address. The assistant manager stated that a few days before, someone dropped off the business check in their office lockbox located in the lobby. A few days after the business check was received, the assistant manager, who has had several

communications with **DREW** in the past, received a phone call from him. **DREW** told her that the check was from his business account and should be good. He also gave her an updated contact phone number, (571) 262-9446, which was the same phone number printed on the check.

38. The assistant manager provided me with a copy of the check and it appeared that the signer of the check was J.B. The check was returned to Vy Reston Heights Apartments due to insufficient funds in the FIBI account.

39. On July 29, 2020, an individual claiming to be **DREW** went to the Reston Post Office to complain that he was not getting mail delivered at his Vy Reston Heights Apartments address for his roommates, “J.B.” and “K.S.” The individual was asked to write the names on a Postal Service card and he wrote the names of J.B., K.S., and **DREW**. He also wrote his phone number on the card as (571) 262-9446.

40. On or about July 30, 2020, I learned that mail being delivered to **DREW**’s Vy Reston Heights Apartments address on that day were two letters addressed to Data Particles, LLC from FIBI; two letters addressed to J.B. from Chase and Ally Bank; and a letter addressed to K.S. from United States Automobile Association (USAA) financial services group, which offers insurance, banking, and investment services for U.S. military members and veterans, precommissioned officers, and their spouses and children. I contacted K.S. who advised that he did not authorize anyone to open a USAA account on his behalf.

**Execution of a Virginia State Search Warrant at  
DREW’s Vy Reston Heights Apartment and DREW’s Second Confession**

41. On August 3, 2020, the U.S. Postal Inspection Service, along with FCPD and LCSO, executed a Virginia state search warrant at **DREW**’s Vy Reston Heights Apartments residence. During the search, I interviewed **DREW** after he was read his *Miranda* warnings, which

he waived in writing. **DREW** admitted to stealing mail from K.S.'s mailbox, including his check to the IRS; J.J.'s business checks; and mail for A.R.'s company, Data Particles, LLC. **DREW** also admitted to opening a bank account with FIBI in the name of Data Particles, LLC, using J.B.'s date of birth and social security number. **DREW** said that J.B. was an old friend whom he had briefly dated. **DREW** stated that he used J.B.'s PII without his consent and had access to the information when they were going to lease an apartment together. He said that he mobile-deposited at least one of the stolen Data Particles, LLC checks for approximately \$20,000.00 into the fraudulent FIBI account bearing that business' name. **DREW** was shown the check drawn on the FIBI account in the name of Data Particles, LLC in the amount of \$26,172.30, which was given to the Vy Reston Heights Apartments for his apartment. He admitted that he created the check on a computer from check stock provided to him by **DOW**.

42. **DREW** also stated that he altered checks and made them payable to **DOW** and that **DOW** had stolen T.M.'s driver's license and bank cards. He also stated that **DOW** at one time drove a white Range Rover. **DREW** also identified himself in surveillance photos from the Vy Reston Heights Apartments stealing parcels left outside the management office in May 2020.<sup>2</sup>

43. From **DREW**'s residence, investigators seized stolen checks, including 14 of the SMC checks and all the NTCA checks stolen from J.J.'s mailbox, which are listed in the table located at paragraph 19. Investigators also found the two Data Particles, LLC checks from Grant Thornton Public Sector stolen from A.R.'s mailbox. I later learned from information provided by

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<sup>2</sup> In May 2020, I received a call from management at the Vy Reston Heights Apartments that **DREW** was still residing in his apartment. They previously thought he had moved out. They suspected him of stealing parcels for other residents which were placed outside the management office for pick up by residents due to the COVID-19 pandemic. They provided me with video surveillance of the thefts.



a FIBI investigator that the fraudulent FIBI Data Particles, LLC account was funded with counterfeits of the two Data Particles, LLC checks from Grant Thornton Public Sector and a counterfeit of check, dated May 14, 2020, in the amount of \$25,000.00 drawn on of SMC's Bank of America account and made payable to Data Particles, LLC, instead of the original payee, Morneau Shepell Ltd. A Grant Thornton Public Sector representative and J.J. confirmed that the checks were counterfeits.

44. Two of the checks found during the search warrant were an original and a counterfeit check drawn on the Dayton Contemporary Dance Co.'s PNC Bank account. They resembled the one deposited into the fraudulent PNC account in T.M.'s name by **DOW**. Representatives of Dayton Contemporary Dance Co. confirmed that the checks were counterfeits. Investigators also found K.S.'s IRS payment check in the amount of \$15,000. It had been altered to be payable to K.S. for deposit at another bank.

#### **DREW and DOW's Fraud Related to the National Emergency COVID-19 Pandemic**

45. In response to the novel coronavirus disease (COVID-19) pandemic, the President declared a national emergency on or about March 13, 2020. On or about March 27, 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act, which authorized Economic Impact Payments (EIPs) – commonly known as “stimulus payments” – to most Americans. For EIPs paid by check, the memo line on the check states that it is an EIP check. During the search warrant at DREW's Vy Reston Heights apartment, within the Eastern District of Virginia, investigators found an EIP U.S. Treasury check in the amount of \$1,200.00 for J.D., who resides in Reston, Virginia. It appears the check was endorsed to be mobile-deposited at Chime Bank. I spoke with J.D., who stated that he had never received this check and he did not authorize anyone

to deposit it on his behalf. J.D. also filed a claim with the U.S. Department of the Treasury's Bureau of the Fiscal Service, which issued these checks, stating that he had not received the check. Investigators found copies of other EIP checks which appeared to be counterfeit.

46. An FCPD detective provided a Treasury Inspector General for Tax Administration (TIGTA) special agent with photographs of seven purported Treasury checks for EIPs found in **DREW**'s residence. The TIGTA agent inspected these checks in person and queried Treasury Department records. Based on his physical review of the purported checks and records, the TIGTA agent determined that six of the purported EIP checks were counterfeit checks and that one of the checks was the stolen, authentic check issued to J.D. The counterfeit checks all used the inventory control and sequence numbers<sup>3</sup> of J.D.'s authentic EIP check and varied in amounts from \$1,200.00 to \$2,400.00. Five of the counterfeit checks were made payable to **DREW**.

47. The TIGTA agent discovered that **DREW** also negotiated the authentic EIP check legitimately issued to him twice. According to Treasury Department records, the Bureau of the Fiscal Service issued **DREW** an EIP check for \$1,200.00, dated May 1, 2020. Federal Reserve Bank records indicated a check with this number had been negotiated twice. The TIGTA agent obtained check images and transaction details for both instances. The images of the two checks were identical. The check was first negotiated on or about May 10, 2020, at, according to the endorsement on the back of the check, "DNV Inc. #1082," which the TIGTA agent determined was a DNV Inc. Check Cashing location at 1082 Elden St., Herndon, Virginia, within the Eastern

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<sup>3</sup> These numbers appear to the right of the words "United States Treasury" and below the date, respectively, on the face of a Bureau of the Fiscal Service-issued Treasury check. They are used as part of the printing process and for accountability of physical check stock. The numbers are generally unique.

District of Virginia. The check was again negotiated on or about May 11, 2020, using a Chime<sup>4</sup> account with banking services provided by The Bancorp Bank.

48. On October 21, 2020, the TIGTA agent visited the DNV Inc. Check Cashing location and met with the cashier, and spoke with the store manager and the cashier's supervisor by phone. The cashier confirmed the "DNV Inc. #1082" endorsement indicated the check had been cashed at that location. The cashier and her supervisor provided the TIGTA agent with a printout from their record system for the customer account that cashed the EIP and provided a copy of that customer's driver's license, which was **DREW**'s. According to their records, **DREW** cashed the check on May 9, 2020.

49. The TIGTA agent also reviewed four photographs of purported EIP checks—including two made payable to **DOW**—that were found during a search of a mobile phone belonging to **DOW** and determined that all four were fraudulent. The information on the checks did not match the legitimate checks issued with those check numbers. According to IRS records, the IRS had not issued any EIPs to **DOW** by any means.

50. The inventory control and sequence numbers on three of the four checks found on **DOW**'s phone matched the inventory control and sequence numbers found on the authentic check issued to J.D. found during the search of **DREW**'s residence. The inventory control and sequence numbers found on the fourth check on **DOW**'s phone matched the numbers found on the authentic

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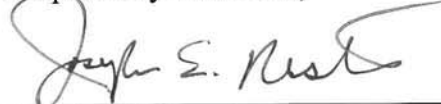
<sup>4</sup> Chime is an online banking platform that makes financial services from several financial institutions available via an app. Chime's features include depositing checks using their mobile app.

EIP check issued to **DREW**. The check number on **DREW**'s EIP check was also one digit different from the check image found on **DOW**'s phone.

### CONCLUSION

51. Based on the information contained herein, I respectfully submit that there is probable cause to believe that on or about December 2019 to August 2020, in Fairfax and Loudoun County, Virginia, within the Eastern District of Virginia, **JONATHAN EDWARD DREW** and **BRANDON HESTAND DOW** did knowingly conspire to execute a scheme and artifice to defraud a financial institution, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations, or promises, contrary to Title 18, United States Code, Section 1344, and in violation of Title 18, United States Code, Section 1349, and each knowingly transferred, possessed, or used, without lawful authority, a means of identification of another person in violation of Title 18, United States Code, Section 1028A.

Respectfully submitted,



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Joseph E. Nastro  
United States Postal Inspector  
United States Postal Inspection Service

Attested to by the applicant by telephone in  
accordance with the requirements of Fed. R.  
Crim. P. 4.1, on November 5, 2020.



Digitally signed by Theresa  
Carroll Buchanan  
Date: 2020.11.05 11:32:20 -05'00'

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The Honorable Theresa Carroll Buchanan  
United States Magistrate Judge

Alexandria, Virginia